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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

ROBIN LINUS LEHNER and DONYA TINA
LEHNER,

Debtors.

Case No.: 22-14616-NMC
Chapter 7

**DECLARATION OF ROBERT E.
ATKINSON IN SUPPORT OF
TRUSTEE'S MOTION TO EXTEND
TIME TO ASSUME OR REJECT
UNEXPIRED LEASES AND
EXECUTORY CONTRACTS**

Hearing Date: *OST Requested*
Hearing Time: *OST Requested*

I, Robert E. Atkinson, hereby declare as follows:

1. I am over the age of 18 and mentally competent.
2. I have personal knowledge of the facts stated herein, and I could and would testify to the same if called upon to do so. Such personal knowledge is based upon my own acts, the records obtained in this case, my own investigations, and discussions with my counsel.¹
3. I am the duly appointed Chapter 7 trustee in the above-captioned case.
4. I make this declaration in support of my *Motion to Extend Time to Assume or Reject Unexpired Leases and Executory Contracts* ("Motion") pursuant to 11 U.S.C. § 365(d)(1).

¹ All capitalized terms used are as defined in the Motion unless stated otherwise.

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1 5. On December 30, 2023, Debtors filed a voluntary Chapter 7 bankruptcy petition,
2 initiating the above-captioned case (“Case”).

3 6. On February 3, 2023, Debtors filed their bankruptcy schedules.

4 7. The current 60-day deadline to assume or reject executory contracts under Section 365
5 is February 28, 2023.

6 8. There may be additional amendment to the bankruptcy schedules.

7 9. The 341 Meeting of Creditors will take place on February 24, 2023.

8 10. I request additional time to examine the leases and executory contracts listed in the
9 bankruptcy schedules to determine their respective value for the bankruptcy estate.

10 11. In light of the recent filing of the bankruptcy schedules, I submit that cause exists to
11 extend the time by additional sixty days, to April 29, 2023.

12 Dated this 16th day of February, 2023.

13 Respectfully submitted by:

14 /s/ Robert Atkinson
15 Robert Atkinson, Trustee
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